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Attorneys at Law

November 22, 2024

**VIA ECF**

Hon. Nina R. Morrison  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Courtroom 6E North  
Brooklyn, New York 11201

**Re: Shrikant Barot v. St. John's University, Case No. 1:22-cv-04823 (NRM) (LKE)**

Dear Judge Morrison:

I represent the Plaintiff, Shrikant Barot, Ph.D., and members of the putative class in the above-referenced matter. Plaintiff brought this action on behalf of himself and all other similarly situated Graduate Teaching Assistants ("GAs") in the College of Pharmacy and Health Sciences, Department of Pharmaceutical Sciences, at St. John's University (the "Class") against Defendant St. John's University for breach of contract and the covenant of good faith and fair dealing, and violation of the New York General Business Law § 349, the New York State Human Rights Law, and the New York City Human Rights law. Plaintiff has alleged Defendant forced the GAs to work without additional compensation in excess of the contractual maximum of 20 hours per week, failed to provide the 9 to 12 contractual tuition free credits per semester, and exploited Plaintiff and the other foreign students on F-1 Visas, which comprised approximately 80% of the GAs, knowing that for them to receive compensation for work in excess of 20 hours per week would violate their visa status. St. John's University thus took advantage of a captive foreign student work force to extract extra work without extra pay.

Pursuant to the Court's June 25, 2024 Order, I write to inform the Court that while Plaintiff does not intend to commence dispositive motions practice *per se*, Plaintiff will move for Rule 23 class certification as soon as practicable and file his motion and a proposed briefing schedule by December 20, 2024.

Respectfully Submitted,

By: /s/ Catherine E. Anderson  
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cc: All counsel of record (via ECF)

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